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July 29, 2015

Hon. William J. Martini, U.S.D.J.
United States Courthouse
50 Walnut Street
Newark, New Jersey 07101

Re: Ahmed Kamal vs. J. Crew Group, Inc., et al.
U.S.D.C. D.N.J. Civil Action No. 2:15-CV-00190-WJM-MF

Dear Judge Martini:

On behalf of plaintiff and the putative class, we protest defense counsel's "letter" filed yesterday (**ECF 31**). After we submitted a 3-sentence cover letter to bring to the Court's attention an important decision just handed down, the defendants improperly submitted a 3-*page* sur-reply to their motion to dismiss (**ECF 23**) to argue that the case, Fullwood v. Wolfgang's Steakhouse, Inc., Civil Action No. 13-07174 (KPF)(S.D.N.Y.), either supports dismissal or should be ignored. Yet, defense counsel is well aware Local Civil Rule 7.1(d)(6) precludes any sur-replies filed without leave of Court.

We understand the defendants' panic that a case upon which they had relied in support of their application instead warrants denial of the motion. Nevertheless, the sur-reply "letter" should be struck, or in the alternative, we respectfully seek leave to submit a response explaining why defendants' fear is justified.

We thank the Court for Your Honor's valuable consideration.

Respectfully submitted,

/s ***Peter Y. Lee***

PETER Y. LEE

PYL/ddh

cc: Andrew O. Bunn, Esq. -***Via ECF Filing***

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